

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

Nov 1 10 51 AM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

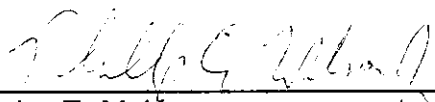
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS MEEHAN
(UPS/USPS-T11-3 through 4)
(November 1, 2001)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Meehan (UPS/USPS-T11-3 through 4).

Respectfully submitted,



John E. McKeever
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3300
(215) 656-3301 (FAX)
and
1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MEEHAN

UPS/USPS-T11-3. Provide the total cost incurred in Fiscal Year 2000 for training Postal Service Window Service personnel. Provide a reference, including page numbers, for your answer.

UPS/USPS-T11-4. Provide the attribution of Window Service training costs to Postal Service products. If the Window Service training costs are not attributed, has the Postal Service studied Window Service training costs to determine whether or not it is possible to attribute them? If the Postal Service has not studied attribution of Window Service training costs, why not?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: November 1, 2001
Philadelphia, PA